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19 **UNITED STATES DISTRICT COURT**
20 **DISTRICT OF NEVADA**

21 RIGHTHAVEN LLC, a Nevada limited-
22 liability company,

23 Plaintiff,

24 v.

25 GARRY NEWMAN, an individual,
26 Defendant.

27 Case No.: 2:10-cv-01762-JCM-PAL

28 **MOTION FOR EXTENSION OF TIME
TO SERVE FOREIGN DEFENDANTS
(First Request)**

Plaintiff, RIGHTHAVEN LLC (“Righthaven”), by and through undersigned counsel,
files this Motion for Extension of Time to Serve Defendant, GARRY NEWMAN, a foreign
individual (“Mr. Newman” and/or “Defendant”) and in support thereof states:

1 1. Plaintiff filed a Complaint (Docket No.: 1) on or about October 12, 2010, for
2 copyright infringement against Defendant.

3 2. Defendant is located in Walsall, England.

4 3. Pursuant to Fed.R.Civ.Proc. 4(f), service of the initial process and pleading upon
5 Mr. Newman, an individual in a foreign country, is permitted by:

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7 “(1) by any internationally agreed means of service that is reasonably calculated to give
8 notice, such as those authorized by the Hague Convention on the Service Abroad of
9 Judicial and Extrajudicial Documents;
10 (2) if there is no internationally agreed means, or if an international agreement allows but
11 does not specify other means, by a method that is reasonably calculated to give notice:
12 (A) as prescribed by the foreign country's law for service in that country in an
13 action in its courts of general jurisdiction;
14 (B) as the foreign authority directs in response to a letter rogatory or letter of
15 request; or
16 (C) unless prohibited by the foreign country's law, by:
17 (i) delivering a copy of the summons and of the complaint to the
18 individual personally; or
19 (ii) using any form of mail that the clerk addresses and sends to the
20 individual and that requires a signed receipt; or
21 (3) by other means not prohibited by international agreement, as the court orders.”

22 3. Therefore, Plaintiff must serve Defendants through the Hague Convention, which
23 takes many weeks for such service.

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CERTIFICATE OF SERVICE

Pursuant to Federal Rule of Civil Procedure 5(b), I hereby certify that I am an employee of Righthaven LLC and that on this 16th day of March, 2011, I caused **MOTION FOR EXTENSION OF TIME TO SERVE FOREIGN DEFENDANT (First Request)** to be to be served by the Court's CM/ECF system.

By: /s/ Anne E. Pieroni
An Employee of Righthaven LLC